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*Counsel to General Electric International, Inc.*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**IN RE WATTSTOCK, LLC,**

***Debtor.***

**WATTSTOCK, LLC,**

***Plaintiff,***

**v.**

**ALTA POWER LLC,**

***Defendant, Counter-Plaintiff, and  
Third-Party Plaintiff,***

**v.**

**WATTSTOCK, LLC,**

***Counter-Defendant, and***

**GENERAL ELECTRIC  
INTERNATIONAL, INC., d/b/a GE  
POWER SERVICES,**

***Third-Party Defendant.***

**Case No. 21-31488-sgj11V**

**Chapter 11  
Subchapter V**

**Adv. No. 21-03083-sgj**

***Removed from the District Court of  
Dallas County, Texas, 116th Judicial  
District***

**Case No. DC-20-08331**

**GENERAL ELECTRIC INTERNATIONAL, INC.'S  
STATEMENT OF ISSUES ON APPEAL**

In compliance with Federal Rule of Bankruptcy Procedure 8009(a)(1)(A), General Electric International, Inc. (“GE”) states the following issues for appeal to the U.S. District Court for the Northern District of Texas from the *Order Granting Motion to Remand Action Back to State Court*, dated March 29, 2023 [Docket No. 140].

1. Whether the Bankruptcy Court erred by entering an order remanding this case to state court rather than issuing proposed findings of fact and conclusions of law for the district court to review de novo as required by 28 U.S.C. § 157(c)(1), and whether the district court should review the remand order de novo as a result. This issue is the subject of a motion for reconsideration currently pending in the Bankruptcy Court [Docket No. 151].

2. Whether the Bankruptcy Court erred by remanding this case under 28 U.S.C. § 1452(b).

3. Whether the Bankruptcy Court erred by concluding that the existence of diversity jurisdiction is not sufficient to keep this case in federal court.

4. Whether the Bankruptcy Court erred by denying GE’s Motion to Withdraw the Reference for All Further Proceedings [Docket No. 103], including without limitation by entering an order rather than issuing proposed findings of fact and conclusions of law for the district court to review de novo as required by Local Rule 5011-1(b), and whether the district court should review the order de novo as a result.

Dated: April 12, 2023

Respectfully submitted,

/s/ Andrew LeGrand

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**CERTIFICATE OF SERVICE**

I certify that, on April 12, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the CM/ECF system of the United States Bankruptcy Court for the Northern District of Texas, which will automatically send e-mail notification of such filing to all counsel of record.

/s/ Andrew LeGrand  
Andrew LeGrand

*Attorney for General Electric International, Inc.*